

# Exhibit D

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C. R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

## IN RE: Bard IVC Filters Products Liability Litigation,

No. 2-15-MD-02641-DGC

**JOINT STIPULATION OF  
DESIGNATION OF RECORD ON  
REMAND PURSUANT TO JPML  
RULE 10.4(a)**

(Assigned to the Honorable David G. Campbell)

1 Pursuant to Rule 10.4(a) of the Rules of Procedure of the United States Judicial Panel  
2 on Multidistrict Litigation, Case Management Order No. 47 (Doc. 21540 at 4), and the  
3 agreement of all parties, Defendants C. R. Bard, Inc., and Bard Peripheral Vascular, Inc.  
4 (collectively, “Bard”), hereby submit the following designations for the record to be  
5 remanded in the cases listed on **Schedules A and B**, attached hereto:

6 • As required by JPML Rule 10.4(b), all entries in the individual member case  
7 dockets for the cases listed on **Schedules A and B**; and  
8 • All documents from the Master MDL case file (No. 15-MD-02641) that are listed  
9 in **Exhibit “A”**, attached hereto.

10 The parties reserve the right to challenge the relevance of any document or filing, in  
11 whole or in part, or any ruling designated herein upon remand. By entering this stipulation,  
12 the parties are not conceding that any ruling binds the parties on the merits or is the law of  
13 the case on remand. Further, while the parties were diligent in reviewing the docket and  
14 making these designations, the parties reserve the right to present to the transferor court any  
15 documents or filings that were inadvertently excluded from this designation.

16 RESPECTFULLY SUBMITTED this 6th day of August, 2020.

17 BEUS GILBERT MCGRODER PLLC

NELSON MULLINS RILEY &  
18 SCARBOROUGH, LLP

19 By: /s/ Mark O'Connor (with permission)

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